

Leading Learners Multi Academy Trust



Freedom of Information Policy

Approved by:	Audit & Risk Committee	Date: 15 October 2025
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Last reviewed on:	16 th July 2026
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Next review due by:	16 th July 2027
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Statement of intent

As an educational provider, Trust Leading Learners MAT("the Trust") has an obligation to publish a freedom of information statement, outlining how we will meet our duties under the Freedom of Information Act 2000 and associated regulations. The development and effective implementation of this policy fulfils that requirement.

More specifically, this policy outlines our school/Trust 's policy and procedures for:

- The release and publication of private data and public records.
- Providing applicants with advice and assistance throughout the duration of their requests.

It also clarifies our position regarding the appropriate limit to the costs incurred by the school/Trust in obtaining any requested information, and on charging fees for its provision.

Legal framework

This policy has due regard to the following legislation:

- The UK General Data Protection Regulation (UK GDPR)

The Data Protection Act 2018

- The Freedom of Information Act 2000
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004

This policy also has due regard to guidance including, but not limited to, the following:

- Cabinet Office (2018) 'Freedom of Information Code of Practice'
- ICO (2021) 'Definition document for the governing bodies of academies and free schools'
- ICO (2015) 'Model publication scheme'
- ICO (2016) 'Duty to provide advice and assistance (Section 16)'
- ICO (2023) 'Time limits for compliance under the Freedom of Information Act (Section 10)'

This policy will be viewed in conjunction with the following other Trust policies:

- Data Protection & Retention Policy
- Freedom of Information Publication Scheme
- Subject Access Request Policy

Accepting requests for information

The school/trust will only accept a request for information which meets all of the following criteria:

- It is in writing, this includes requests sent to the school/Trust's official social media accounts
- It states the name of the applicant and an address for correspondence
- It adequately describes the information requested

A request will be treated as made in writing if it meets all of the following requirements:

- It is transmitted by electronic means
- It is received in legible form
- It is capable of being used for subsequent reference

Where a request is submitted in a foreign language, the school/trust is not expected to obtain a translation of the request. For the request to be processed, the school/trust will ask the applicant to provide their request in English.

A request for information not included already published must be made in writing to:

Email:

enquiries@leadinglearnersmat.co.uk

Post:

Data Protection Office
Leading Learners MAT,
Astley
Tyldesley
Greater Manchester
M29 7PY

General rights of access to information held by the school/trust

Provided that the request meets the requirements set out in above , the school/trust will comply with its duty to:

- Confirm or deny to any person making a request for information to the school/trust, whether it holds information of the description specified in the request.
- Provide the documentation if the school/trust confirms that it holds the requested information.

This will be completed no later than 20 school days, or 60 working days if this is shorter, from receipt of the request. Where a fee is charged, the timeframe within which the school/trust has to respond to the request begins from the day the fee is received.

The school/trust will not comply with this duty where:

- It reasonably requires further information to meet a freedom of information request, has informed the applicant of this requirement, but was not subsequently supplied with that further information.

- The information is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.
- A request for information is exempt under section 2 of the Freedom of Information Act 2000.
- The cost of providing the information exceeds the appropriate limit.
- The request is vexatious.
- The request is a repeated request from the same person made within 60 consecutive working days of the initial one.
- A fee notice was not honoured.
- The requested information is not held by the school for the purposes of the school/trust's business.

Where information is, or is thought to be, exempt, the school/trust will, within 20 school days, give notice to the applicant which:

- States that fact.
- Specifies the exemption in question.

If information falls within scope of a qualified exemption and the school/trust needs additional time to consider the public interest test, the school/trust may extend the deadline. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.

Where a public interest test extension is required, the school/trust will write to the applicant to inform them of this, stating the following information:

- Which exemption(s) the extension relies on and why
- A revised deadline for when the applicant will receive their response

Where a deadline has to be further extended, the school/trust will write to the applicant again, stating the information outlined above.

Requests for information that is not recorded by the school/trust (e.g. requests for explanations, clarification of policy and comments on the school/trust's business) will not be considered valid requests. In these cases, the applicant will be provided with an explanation of why their request will not be treated under the Freedom of Information Act 2000 and the school/trust will respond to the applicant through other channels as appropriate.

The information provided to the applicant will be in the format that they have requested, where possible. Where it is not possible to provide the information in the requested format, the school/trust will assist the applicant by discussing alternative formats in which it can be provided. The information provided will also be in the language in which it is held, or another language that is legally required. If, under relevant disability and discrimination regulations, the school/trust is legally obliged to provide the information in other forms and formats, it will do so.

In some cases, a request may be dealt with under more than one access regime, e.g. if the request involves both information about the school/trust and personal information, it will be dealt with under the Freedom of Information Act 2000 and the Data Protection Act 2018.

Staff are made aware that it is a criminal offence to alter, deface, block, erase, destroy or conceal any information held by the school/trust with the intention of preventing disclosure following a request.

The appropriate limit

The school/trust will not comply with any freedom of information request that exceeds the statutorily imposed appropriate limit of £450. When determining whether the cost of complying with a freedom of information request is within the appropriate limit, the school/trust will take account only of the costs we reasonably expect to incur in relation to:

- Determining whether it holds the information.
- Locating the information, or a document which may contain the information.
- Retrieving the information, or a document which may contain the information.
- Extracting the information from a document containing it.
- Costs related to the time spent by any person undertaking any of the activities outlined in this policy on behalf of the school/trust, are to be estimated at a rate of £25 per person per hour.

The school/trust is not required to search for information in scope of a request until it is within the cost limit. If responding to one part of a request would exceed the cost limit, the school/trust does not have to respond to any other parts of the request.

Where multiple requests for information are made to the school/trust within 60 consecutive working days of each other, either by a single person or by different persons who appear to be acting in concert, the estimated cost of complying with any of the requests is to be taken to be the total costs to the school/trust of complying with all of them **Using AI to help draft information requests**

AI tools can be helpful, but they can also introduce errors or create overly complex requests that increase the burden on public bodies and cost to the taxpayer. When using AI to help draft an information request, please make sure the final wording has been checked and reflects your actual information needs.

Before you submit a request or secondary correspondence, please check that:

1 You are only asking for the information you are genuinely looking for.

AI tools sometimes generate broad or excessive wording that goes beyond the information you actually want or need;

2. The request is clear, concise and focused.

Short, straightforward requests are easier for us to process and usually lead to quicker, more accurate responses;

2 There are no obvious factual inaccuracies.

AI can misrepresent legislation or misstate what organisations do. Please review the text of your request carefully and don't assume AI is right. If it has referred to something you don't understand, check what it is; and

3 The tone is appropriate.

AI-generated content can sometimes sound abrupt, or otherwise inappropriate. Please check the tone before sending.

Charging fees

The school/trust may, within 20 school days, give an applicant who has requested information from the school/trust a written notice stating that a fee is to be charged for the school/trust's compliance.

Charges may be made for disbursements, such as the following:

- Production expenses, e.g. printing and photocopying
- Transmission costs, e.g. postage
- Complying with the applicant's preferences about the format in which they would like to receive the information, e.g. scanning to a CD

Fees charged will not exceed the total cost to the school/trust of:

- Informing the person making the request whether we hold the information.
- Communicating the information to the person making the request.

Where a fee is to be charged, the school/trust will not comply with the General rights of access unless the requested fee is paid within a period of three months, beginning with the day on which the fees notice is given to the applicant.

Where a fee is paid by cheque, the school/trust has the right to wait until the cheque is cleared before commencing work. Once a fee is received, the school/trust will inform the applicant of the revised response deadline, i.e. an additional 20 school days (or 60 working days).

When calculating the 20th school day in which to respond to a freedom of information request, the period beginning the day on which the fee notice is given to the applicant and ending with the day on which the fee is received will be disregarded.

Means of communication

Where, on making a request for information, the applicant expresses a preference for communication the school/trust will, as far as is practicable, give effect to that preference.

Where a preference is not stated by the applicant, the school/trust will communicate by any means which are reasonable under the circumstances. For example, where an applicant uses social media to make a request, the school/trust may respond via an alternative medium..

Providing advice and assistance

The school/trust will meet its duty to provide advice and assistance, as far as is reasonable, to any person who proposes to make, or has made, requests for information to the school/trust. The school/trust may offer advice and assistance in the following circumstances:

- If an individual requests to know what types of information the school/trust holds and the format in which it is available, as well as information on the fees regulations and charging procedures.
- If a request has been made, but the school/trust is unable to regard it as a valid request due to insufficient information, leading to an inability to identify and locate the information.
- If a request has been refused, e.g. due to an excessive cost, and it is necessary for the school/trust to assist the individual who has submitted the request.

The school/trust will provide assistance for each individual on a case-by-case basis; examples of how the school/trust will provide assistance include the following:

- Informing an applicant of their rights under the Freedom of Information Act 2000
- Assisting an individual in the focus of their request, e.g. by advising of the types of information available within the requested category
- Advising an applicant if information is available elsewhere and how to access this information
- Keeping an applicant informed on the progress of their request

Where the school/trust wishes to ask a different public authority to deal with a request by transferring it to them, this will only be done with the agreement of the applicant.

In order to provide assistance as outlined above, the school/trust will engage in the following good practice procedures:

- Make early contact with an individual and keep them informed of the process of their request
- Accurately record and document all correspondence concerning the clarification and handling of any request
- Give consideration to the most appropriate means of contacting the applicant, taking into account their individual circumstances
- Remain prepared to assist an applicant who has had their request denied due to an exemption

The school/trust will give particular consideration to what level of assistance is required for an applicant who has difficulty submitting a written request.

In circumstances where an applicant has difficulty submitting a written request, the school/trust will:

- Make a note of the application over the telephone and then send the note to the applicant to confirm and return – the statutory time limit for a reply would begin here.
- Direct the individual to a different agency that may be able to assist with framing their request.

Please note: This list is not exhaustive, and the school/trust may decide to take additional assistance measures that are appropriate to the case.

Where an applicant's request has been refused either because the information is accessible by other means, or the information is intended for future publication or research, the school/trust, as a matter of good practice, will provide advice and assistance. The school/trust will advise the applicant how and where information can be obtained, if it is accessible by other means or where there is an intention to publish the information in the future, the school/trust will advise the applicant of when this publication is expected.

If the school/trust is able to clearly identify the elements of a request, it will respond following usual procedures and will provide advice and assistance for the remainder of the request. If any additional clarification is needed for the remainder of a request, the school/trust will ensure there is no delay in asking for further information. Applicants are given two months to provide any requested clarification. If an applicant decides not to follow the school/trust's advice and assistance and fails to provide clarification, the school/trust is under no obligation to contact the applicant again. If the school/trust is under any doubt that the applicant did not receive the advice and assistance, the school/trust will re-issue it. The school/trust is not required to provide assistance where an applicant's request is vexatious or repeated, as defined under section 14 of the Freedom of Information Act 2000.

We are also not required to provide information where the cost of complying with a request exceeds the limit outlined in the Freedom of Information Act 2000. In such cases, we will consider whether any information can be provided free of charge if the requestor refuses to pay the fee.

A record will be kept by [the school and trust](#) of all the advice and assistance provided.

Consultation with third parties

The school/trust may need to consult third parties about information held in scope of a request to consider whether it would be suitable to disclose the information. Situations where third parties may need to be consulted include the following:

- When requests relate to persons or bodies who are not the applicant and/or the school/trust
- When the disclosure of information is likely to affect the interests of persons or bodies who are not the applicant the school or trust.

Internal reviews

When responding to requests for information, the details of the trust's internal review process will be set out, including information about how applicants can request an internal review.

Applicants will also be informed of their right to complain to the ICO if they are still dissatisfied following the outcome of the trust's internal review.

Requests for an internal review should be made in writing to the trust.

For a request for an internal review to be accepted, it must be made within 40 trust days from the date the trust issued an initial response to the request.

Upon receipt of an application, the trust will acknowledge an application and inform the applicant of the intended response date. Responses will usually be delivered within 20 trust days of receipt of the application.

If an internal review is complex, requires consultation with third parties or the relevant information is of high volume, the trust may need to extend the usual response timeframe. In these cases, the trust will inform the applicant and provide an alternative response date. In most cases, the extension will exceed no more than a further 20 trust days; however, the actual length of the extension will be decided on a case-by-case basis.

Where clarification is needed from an applicant regarding the review, the normal response period will not begin until clarification is received. Wherever possible, the review will be undertaken by a different member of staff than the person who took the original decision. During a review, the trust will evaluate the handling of the request; particular attention will be paid to concerns raised by the applicant.

The applicant will be informed of the outcome of the review and a record will be kept of such reviews and the final decision that is made. If the outcome of the review is to disclose information that was previously withheld, the information will be provided to the applicant at the same time they are informed of the response to the review, where possible. If this is not possible, the applicant will be informed of when the information will be provided.

Within the response to a review, the applicant will be informed again of their right to complain to the ICO.

Our Publication scheme

This publication scheme guides you to information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as 'classes'

The classes of information that we undertake to make available are organised into 3 broad topic areas:

- Website – each academy has their own website, and we also have our Trust website
- Governance Documents
- Policies and other information related to our Trust and its academies

Classes of Information Currently Published

The information required to be published online can be found here: What academies, free schools and colleges must or should publish online - GOV .UK (www.gov.uk)

Governance Documents:

This section sets out information published in our governance documents:

- The name of our Trust and its academies
- The category of each academy
- Our governance structure
- The term of office of our trustees and Local Governors
- Those responsible for appointing our trustees and Local Governors
- Details of delegated authority and decision making
- Written rules about how the company (the Trust) is run.

Minutes of governance meetings:

Agreed governance minutes can be obtained upon request.

Policies and Information:

This section sets out details of policies and information that can be found on our websites:

- Anti Fraud Policy
- Behaviour
- Charges and Remissions Policy
- Complaints Policy
- Equality Diversity & Inclusion Policy & Equality Objectives
- Health and Safety Policy
- Reserves Policy
- Whistleblowing Policy
- Data Protection Policy
- Privacy Notices
- Child Protection and Safeguarding Policy
- Our Vision and Values
- Attendance Policy
- SEN and Disability Policy

■ SEN Local Offer Information

Other information related to our Trust and its academies:

- Our vision and values
- Published Ofsted reports
- Academy session times and term dates
- Details of academy events and Inset days throughout the academic year

Contracts and outsourced services

The trust will make clear what information is held by third party contractors on behalf of the trust .

Where a contractor holds information relating to a contract held with the trust on behalf of the Trust , this information is considered in the same way as information held by a public authority and so is subject to the Freedom of Information Act 2000.

When entering into a contract, the trust and contractor will agree what information the trust will consider to be held by the contractor on behalf of the trust, this will be indicated in the contract.

Appropriate arrangements will be put in place for the trust to gain access to information held by the contractor on the trust 's behalf, in the event that a freedom of information request is made. These arrangements will be set out in a contract, and will cover areas including, but not limited to, the following:

- How and when the contractor should be approached for information and who the points of contact are
- How quickly information should be provided to the trust
- How any disagreement about disclosure between the trust and contractor will be addressed
- How requests for internal reviews and appeals to the ICO will be managed
- The contractor's responsibility for maintaining record keeping systems in relation to the information they hold on behalf of the trust
- The circumstances under which the trust must consult with the contractor about disclosure and the process for doing so
- The types of information which should not be disclosed and the reasons for this confidentiality, where appropriate

In some situations, the trust may offer or accept confidentiality arrangements that are not set out within a contract with a third party. The trust and the third party will both be aware of the

legal limits placed on the enforceability of expectations of confidentiality and the public interest in transparency. Such expectations will only be created where it is appropriate to do so.

Contractors must comply with requests from the trust for access to information they hold on behalf of the trust. Requests for information held by a contractor on behalf of the trust will be responded to by the trust. If a contractor receives a request, this will be passed onto the trust for consideration.

Monitoring and review

This policy will be reviewed on an annual basis, or in light of any changes to relevant legislation, by the headteacher.